

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re Terrorist Attacks on September 11, 2001

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) 03 MDL 1570 (GBD)  
) ECF Case  
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)

This document relates to:  
*Continental Casualty Co. v. Al Qaeda, 04-cv-05970*

**DUBAI ISLAMIC BANK'S ANSWER TO PLAINTIFFS'  
SECOND AMENDED COMPLAINT AND  
ADDENDUM TO SECOND AMENDED COMPLAINT<sup>1</sup>**

1. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

**JURISDICTION AND VENUE**

2. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
3. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
4. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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<sup>1</sup> Note that each numbered paragraph in this answer corresponds with and responds to the paragraph in the Continental Casualty Co. v. Al Qaeda Complaint bearing the same number.

**THE PARTIES**

5. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
6. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
7. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
8. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
9. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
10. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
11. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
12. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
13. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

14. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
15. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
16. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
17. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
18. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
19. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
20. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
21. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

22. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
23. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
24. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
25. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
26. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

#### **SUMMARY OF ALLEGATIONS**

27. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
28. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
29. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
30. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
31. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
32. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

33. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
34. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
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43. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
44. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
45. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
46. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

## **THE SUDAN**

47. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
48. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
49. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
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69. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
70. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
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88. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
89. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
90. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
91. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.



92. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

### **IRAQI TERRORISM**

93. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
94. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
95. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
96. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
97. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

### **THE 1993 WTC BOMBING**

98. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
99. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
100. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
101. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
102. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
103. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
104. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
105. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

- 106. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 107. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 108. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

#### **SOMALIA**

- 109. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

#### **1994-1996**

- 110. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 111. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 112. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

#### **RETURN TO AFGHANISTAN**

- 113. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 114. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 115. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 116. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 117. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 118. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

119. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
120. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
121. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
122. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
123. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
124. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
125. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
126. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
127. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
128. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

#### **U.S. EMBASSY BOMBINGS**

129. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
130. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
131. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
132. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
133. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

- 134. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 135. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

**THE 1998 U.S. AIR STRIKES ON AL QAEDA**

- 136. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 137. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 138. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 139. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 140. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 141. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 142. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 143. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 144. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 145. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 146. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 147. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

### **MILLIENIUM PLOT**

- 148. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 149. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 150. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

### **ATTACK ON U.S.S. COLE**

- 151. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 152. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 153. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 154. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

### **AL QAEDA-SAUDI HIJACKING**

- 155. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 156. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

### **IRAQI THREATS**

- 157. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 158. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 159. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 160. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

#### **IRAQI FORE-KNOWLEDGE OF THE SEPTEMBER 11th ATTACKS**

- 161. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 162. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 163. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 164. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 165. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 166. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 167. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 168. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 169. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

#### **PREPARATION FOR SEPTEMBER 11th ATTACKS**

- 170. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 171. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 172. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 173. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 174. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

- 175. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 176. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 177. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 178. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 179. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 180. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 181. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

#### **SEPTEMBER 11th ATTACKS**

- 182. DIB admits only that on September 11, 2001, an airplane crashed into the North Tower of the World Trade Center in New York. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.
- 183. DIB admits only that on September 11, 2001, an airplane crashed into the South Tower of the World Trade Center in New York. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.
- 184. DIB admits only that on September 11, 2001, an airplane crashed into the Pentagon. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.
- 185. DIB admits only that on September 11, 2001, an airplane crashed into a field in Shanksville, Pennsylvania. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.
- 186. DIB admits only that on September 11, 2001, the South and North Towers of the World Trade Center collapsed. DIB is without knowledge or information sufficient to form a

belief about the truth of the remaining allegations, and therefore those allegations are denied.

187. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

**POST SEPTEMBER 11th**

188. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
189. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
190. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
191. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
192. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
193. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
194. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
195. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
196. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
197. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
198. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
199. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.



200. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
201. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
202. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
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205. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
206. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
207. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
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210. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
211. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
212. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
213. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
214. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

- 215. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 216. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 217. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 218. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

**HAMBURG AL-QAEDA CELL**

- 219. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 220. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 221. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 222. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 223. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
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- 238. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

**STATEMENTS OF CAPTURED AL QAEDA MEMBERS**

- 239. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 240. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 241. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 242. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
- 243. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

## **SAUDI ARABIAN DEFENDANTS**

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**SAUDI BIN LADEN GROUP**

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**MUWAFFAQ-BLESSED RELIEF; AL-QADI AND BIN MAHFOUZ**

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#### **AL-RAJHI BANK**

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#### **NATIONAL COMMERCIAL BANK AND BIN MAHFOUZ**

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#### **INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**

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#### **THE MUSLIM WORLD LEAGUE**

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#### **THE SAAR FOUNDATION**

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**AL BARAKA INVESTMENT AND DEVELOPMENT CORP.**

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**AL-HARAMAIN**

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and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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517. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

518. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

#### **AL-BARAKAAT AND JUMALE**

519. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

520. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

#### **Saudi American Bank**

521. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

522. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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525. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

526. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

#### **MERCY INTERNATIONAL RELIEF AGENCY**

527. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

528. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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**MISCELLANEOUS INTERNATIONAL SPONSORS AL TAQWA AND NADA  
MANAGEMENT ORGANIZATION**

539. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

- 540. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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- 544. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Rabita Trust**

- 545. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 546. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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#### **THE GLOBAL RELIEF FOUNDATION**

553. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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572. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

#### **TAIBAH INTERNATIONAL AID ASSOCIATION**

573. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

574. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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582. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

583. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

584. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

#### **AL RASHID TRUST**

585. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

#### **LAUNDERING OF AL QAEDA FUNDS THROUGH DIAMOND BUSINESSES**

586. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

587. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

591. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

592. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

#### **AFGHAN SUPPORT COMMITTEE (ASC)**

593. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

#### **SHAYKH SAI'ID**

594. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

#### **ALLEGATIONS COMMON TO ALL CLAIMS FOR RELIEF**

595. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

596. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

597. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

598. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

599. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

**FIRST CLAIM FOR RELIEF**

600. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
601. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
602. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
603. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
604. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
605. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
606. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.

**SECOND CLAIM FOR RELIEF**

607. No response is required from DIB to the allegations in this paragraph as the RICO cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

608. No response is required from DIB to the allegations in this paragraph as the RICO cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
609. No response is required from DIB to the allegations in this paragraph as the RICO cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
610. No response is required from DIB to the allegations in this paragraph as the RICO cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
611. No response is required from DIB to the allegations in this paragraph as the RICO cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
612. No response is required from DIB to the allegations in this paragraph as the RICO cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
613. No response is required from DIB to the allegations in this paragraph as the RICO cause of action against DIB was dismissed by the Memorandum Decision and Order of the



Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

### **THIRD CLAIM FOR RELIEF**

614. No response is required from DIB to the allegations in this paragraph as the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
615. No response is required from DIB to the allegations in this paragraph as the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
616. No response is required from DIB to the allegations in this paragraph as the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
617. No response is required from DIB to the allegations in this paragraph as the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

DIB denies that Plaintiffs are entitled to recover from DIB any of the relief requested in the WHEREFORE clause. To the extent the WHEREFORE clause relates to defendants other



than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

Each and every averment in Plaintiff's Second Amended Complaint that has not been specifically admitted is hereby denied.

**ADDENDUM TO SECOND AMENDED COMPLAINT**

**A. Al Rajhi Banking & Investment Corporation**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**B. Sulaiman Abdel Aziz al Rajhi**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**C. Saleh Abdulaziz Al Rajhi**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**D. Abdullah Sulaiman Al Rajhi**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**E. Sheikh Abdul Aziz Al Ibrahim**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**F. World Assembly of Muslim Youth**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**G. The Adbul Aziz al Ibrahim Foundation**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**H. Saleh Abdullah Kamel, Dallah Al Baraka Group and Al Baraka Investment And Development**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**I. Yeslam Bin Laden**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**J. Al-Barakaat, Al-Barakat Bank of Somalia, Al-Barakat Finance Group, Al-Barakat Financial Holding Co., Al Barakat Global Telecommunications, Al-Barakat Group of Companies Somalia Limited, Al-Barakat International, Al-Barakat Investments, Barakat Wire Transfer Company**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**K. Al Shamal Islamic Bank a/k/a Shamel Bank a/k/a Bank El Shamar**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**L. Omar al-Bayoumi**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**M. Mamoun Darkazanli**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**O. Global Relief Foundation**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**P. Bank Al Taqwa, Yousef Nada and Ahmed Nasreddin**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Q. Islamic African Relief Agency**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**R. Benevolence International Foundation**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**S. Yassin Abdullah Al-Qadi**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations

**T. Wafa Humanitarian Organization**

DIB admits only that it was a former shareholder of Tadamon Islamic Bank. To the extent that the remaining allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

**U. Al Haramain Islamic Foundation (“AHIF”)**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**V. SAAR Network Executives**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**W. Asat Trust**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**X. Dar AL Maal Al Islami Trust**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Y. Saudi Bin Laden Group (“SBG”)**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Z. Bakr bin Laden**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**AA. Abdullah bin Lden and Omar bin Laden**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**BB. Tarek bin Laden**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**CC. Mohammed Bin Laden Organization**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**DD. Prince Naif**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**EE. Rabita Trust**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**FF. Prince Abdullah Al Faisal Bin Abdulaziz Al Saud, Mohammed Bin Abdulrahman Al Ariefy, and Alfaisaliah Group (a/k/a al Faisal Group Holding Co.)**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**GG. Abdulrahman Alamoudi**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**HH. Prince Mohamed Al-Faisal Al-Saud (“Prince Mohamed”)**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**II. African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, Inc., International Institute of Islamic Thought, Mar-Jac Investments, Inc., Mena Corporation, Reston Investments, Inc., Safa Trust, Sterling Charitable Gift Fund, Sterling Management Group, Inc., and York Foundation (the “Saar Network Entities”)**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**JJ. Mar-Jac Poultry, Inc.**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**KK. Saudi Red Crescent Society (SRC) and Dr. Abdul Rahman Al Swailem (Al Swailem)**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**LL. Adnan Basha**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**MM. Shahir A. Batterjee**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**NN. Dr. Abdullah bin Abdul Mohsen Al-Turki**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**OO. International Islamic Relief Organization (“IIRO”)**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**PP. Saudi Joint Relief Committee for Kosovo and Chechnya**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**QQ. Wael Julaiden**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.



**RR. Tarik Hamdi**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**SS. Saudi High Commission for Relief to Bosnia and Herzegovina**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**TT. Prince Salman bin Abdul Aziz al-Saud (Prince Salman)**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**UU. National Commercial Bank**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**VV. Prince Sultan bin Abdul Aziz Al Saud**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**XX. Soliman H.S. Al-Buthe**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**YY. Faisal Islamic Bank-Sudan (FIBS)**

These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**ZZ. Dubai Islamic Bank**

DIB denies Plaintiffs' allegation that Dubai Islamic Bank has long been associated with laundering al Qaeda money.

DIB admits Plaintiffs' allegation that DIB was founded in 1975. DIB denies Plaintiffs' allegation that it is the longest running bank under Shari'ia law

DIB denies Plaintiffs' allegation that "DIB's involvement with terrorist financing began in the early 1990s, when it was a major shareholder in the Bank of Credit and Commerce International ("BCCI")." Plaintiffs' allegation that BCCI was named in a 1992 U.S. Senate Report as a money laundering operation used to sponsor terrorism purports to characterize the contents of a document, which speaks for itself and requires no response. To the extent this allegation requires a response, DIB is without knowledge or information sufficient to form a belief about the truth of the allegation, and therefore it is denied.

DIB denies that it allowed itself to be used by Osama bin Laden to launder money. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations concerning the State Department, the Treasury Department, National Security Council, and "the government."

DIB is without knowledge or information sufficient to form a belief about the truth of the allegations regarding a July 8, 1999 State Department press conference, and therefore those allegations are denied.

DIB is without knowledge or information sufficient to form a belief about the truth of the allegations that the federal government possessed evidence demonstrating that Osama bin Ladin and al Qaeda were using the Dubai Islamic Bank to finance terrorist attacks against American interests, and therefore those allegations are denied.

Plaintiffs allegations concerning the reporting of New York Times that the Central Intelligence Agency had obtained evidence showing that bin Ladin had been allowed to funnel money through the Dubai Islamic Bank purport to characterize the contents of a document, which speaks for itself and requires no response. To the extent a response is required, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

Plaintiffs' allegations regarding a quotation from the Times purport to characterize the contents of a document, which speaks for itself and requires no response. To the extent that a response is required, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

Plaintiffs' allegations that concerning "these reports" and a subsequent NATO Parliamentary Assembly analysis purport to characterize the contents of other documents, which speak for themselves and require no response. To the extent that a response is required, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied..

Plaintiffs' allegations that in its November 5, 2004 final general report titled, "The economic consequences of September 11, 2001 and the economic dimension of anti-terrorism," purport to characterize the contents of a document, which speaks for itself and requires no response. To the extent these allegations are deemed to require a response, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

DIB denies the allegation that Dubai Islamic Bank was directly involved in financing the September 11 attacks.

DIB is without knowledge or information sufficient to form a belief about the truth of the allegation that Mustafa Ahmed al-Hisawi (Sheikh Saeed al Masri), bin Ladin's chief financial officer while in the Sudan, lived in the Emirates from June 2001 until September 11, 2001, when he fled for Karachi, Pakistan, and therefore the allegations are denied.

DIB denies the allegations that American authorities have identified at least \$500,000 that flowed from his accounts to all nineteen hijackers, including hundreds of thousands of dollars in money transfers from Dubai Islamic Bank (and its affiliate and correspondent, Standard Chartered Bank) to two of the hijackers (Mohammed Atta and Marwan al-Shehhi) since at least June 2000, to pay for their flight training and expenses.

DIB is without knowledge or information sufficient to form a belief about the truth of the allegation that just two days before the September 11 attacks, hijackers Atta, al-Shehhi and Walid al-Sheri transferred back \$15,000 in "surplus funds" back to al-Hisawi, and therefore the allegations are denied.

The allegations that all these transactions were carried out in violation of international standards adopted to prevent money laundering, including the 40 Recommendations on Money Laundering adopted in 1990 by the international Financial Action Task Force, of which the UAE is a member are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.

DIB denies the allegation that the hijackers also employed Dubai Islamic Bank to donate to Muslim charities.

DIB is without knowledge or information sufficient to form a belief about the truth of the allegation that an agreement for automatic withdrawal dated July 25, 1999, indicates that hijacker Marwan al Shehhi donated money to Darbar Charity, and therefore the allegations are denied.

DIB is without knowledge or information sufficient to form a belief about the truth of the allegation that the money was transferred from Hong Kong Shanghai Bank account no. 61052114001 into Dubai Islamic Bank account no. 1520449474101, and therefore the allegations are denied.

DIB denies that the Central Bank of the UAE froze the accounts of Dubai Islamic Bank shortly after the 9/11 Attack. The allegations regarding a regulatory alert issued by Luxembourg authorities purport to characterize the contents of a document, which speaks for itself and requires no response. To the extent these allegations are deemed to require a response, they are denied.

DIB denies the allegation that Dubai Islamic Bank has been a key shareholder in other banks well-known for their involvement in laundering money on behalf of the Enterprise, including the Bank of Credit and Commerce International (BCCI), Tadamon Islamic Bank and Baraka Islamic Bank, an affiliate of Al Baraka Bank.

DIB denies the allegation that Dubai Islamic Bank continued to knowingly provided financial services and other forms of material support to al Qaeda or disregarded warnings and refused to adhere to even minimal banking industry standards designed to thwart the support of terrorist networks like the al Qaeda Movement through anti-terrorist and money laundering safeguards and “know your customer” regulations.

Each and every averment in Plaintiff’s Addendum to Second Amended Complaint that has not been specifically admitted is hereby denied.

## **AFFIRMATIVE DEFENSES**

### **First Affirmative Defense**

1. Plaintiffs fail to state a claim for which relief can be granted.

### **Second Affirmative Defense**

2. This Court does not have personal jurisdiction over Plaintiffs’ claims against DIB.

**Third Affirmative Defense**

3. This Court does not have subject matter jurisdiction over Plaintiffs' claims against DIB.

**Fourth Affirmative Defense**

4. There is no causal connection between any of DIB's activities and Plaintiffs' asserted injuries.

**Fifth Affirmative Defense**

5. No act or omission of any agent, servant, or employee of DIB proximately caused any harm or damages to Plaintiffs.

**Sixth Affirmative Defense**

6. Plaintiffs fail to adequately allege scienter.

**Seventh Affirmative Defense**

7. Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

**Eighth Affirmative Defense**

8. DIB is not liable for Plaintiffs' damages based on the doctrines of several liability and/or combined or comparative fault, see, e.g., N.Y. C.P.L.R. § 1601 et seq.

**Ninth Affirmative Defense**

9. This Court is not the proper venue for Plaintiffs' claims against DIB.

**Tenth Affirmative Defense**

10. Plaintiffs have waived their claims based on the doctrine disallowing double-recovery.

**Eleventh Affirmative Defense**

11. Plaintiffs have waived their claims based on the collateral source doctrine.

**Twelfth Affirmative Defense**

12. Plaintiffs have waived their claims based on the doctrine of equitable subrogation.

**Thirteenth Affirmative Defense**

13. Plaintiffs' have waived their claims based on the doctrine of waiver of subrogation.

**Fourteenth Affirmative Defense**

14. Plaintiffs' claims are barred to the extent that they failed to mitigate damages.

**Fifteenth Affirmative Defense**

15. Plaintiffs have waived their claims against DIB.

**Sixteenth Affirmative Defense**

16. Plaintiffs' claims have been waived to the extent that certain Plaintiffs are seeking recovery against DIB for the same or similar claims in other civil actions comprising the multi-district entitled *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (RCC), pending in the United States District Court for the Southern District of New York.

**Seventeenth Affirmative Defense**

17. Plaintiffs' state-law claims are pre-empted by federal law.

**Eighteenth Affirmative Defense**

18. Plaintiffs' claims are barred by the Act of State doctrine.

**Nineteenth Affirmative Defense**

19. Plaintiffs' claims are barred based on principles of International Comity.

**Twentieth Affirmative Defense**

20. Plaintiffs' claims are barred based on Sovereign Immunity.

**Twenty-first Affirmative Defense**

21. Plaintiffs' claims are barred by Political Question doctrine.

**Twenty-second Affirmative Defense**

22. Plaintiffs' claims are barred based on principles of Immunity.

**Twenty-third Affirmative Defense**

23. Plaintiffs' claims are barred by the doctrine of laches.

**Twenty-fourth Affirmative Defense**

24. Plaintiffs' claims have been discharged in bankruptcy.

**Twenty-fifth Affirmative Defense**

25. Plaintiffs' claims are barred by the doctrine of election of remedies.

**Twenty-sixth Affirmative Defense**

26. Plaintiffs have released their claims against DIB.

**Twenty-seventh Affirmative Defense**

27. Plaintiffs have discharged their claims against DIB.

**Twenty-eighth Affirmative Defense**

28. Plaintiffs' claims are barred by the doctrine of compromise and settlement.

**Twenty-ninth Affirmative Defense**

29. Plaintiffs are precluded from asserting their claims by the doctrine of res judicata.

**Thirtieth Affirmative Defense**

30. Plaintiffs are precluded from asserting their claims by the doctrine of collateral estoppel.

**Thirty-first Affirmative Defense**

31. Plaintiffs lack standing to pursue their claims against DIB.

**Thirty-second Affirmative Defense**

32. Plaintiffs' claims are barred by the statute of limitations.

**Thirty-third Affirmative Defense**

33. Plaintiffs are estopped from receiving the relief requested against DIB.

**Thirty-fourth Affirmative Defense**

34. Plaintiffs' claims are invalid in light of workers' compensation laws, regulations, rules, and case law.

**Thirty-fifth Affirmative Defense**

35. Plaintiffs' claims are barred to the extent that they violate DIB's right to Due Process.

**Thirty-sixth Affirmative Defense**

36. Plaintiffs' claims for punitive damages against DIB are invalid because DIB's activities, as alleged by Plaintiffs, were not committed with intent, malice, willful and outrageous

conduct aggravated by evil motive, or reckless indifference, and none of DIB's activities in any way were intended to, or did harm, the Plaintiffs in this action.

**Thirty-seventh Affirmative Defense**

37. In response to Plaintiffs' claims, DIB intends to invoke all other defenses, including affirmative defenses, that become apparent in the future (including through discovery), and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses at a later point in time.

DATED: September 7, 2010

Respectfully submitted,

/s/ Robert G. Houck

Robert G. Houck

Juan P. Morillo (admitted *pro hac vice*)

Steven T. Cottreau (admitted *pro hac vice*)

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